

CHAD T. WISHCHUK, SBN 214779
E-mail: cwishchuk@mftb.com
LAURA B. MACNEEL, SBN 251540
E-mail: lmacneel@mftb.com

MARKS, FINCH, THORNTON & BAIRD, LLP

ATTORNEYS AT LAW

8620 SPECTRUM CENTER BOULEVARD - SUITE 900
SAN DIEGO, CALIFORNIA 92123-1489

TELEPHONE: (858) 737-3100
FACSIMILE: (858) 737-3101

Attorneys for Defendant William Charles Porges, dba Accelerated Electric



UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

INTERNATIONAL
BROTHERHOOD OF ELECTRICAL
WORKERS UNION, LOCAL 234
ELECTRICAL WORKERS
HEALTH & WELFARE TRUST
FUND; LOCAL 234 OF THE
INTERNATIONAL
BROTHERHOOD OF ELECTRICAL
WORKERS, AFL-CIO;
INTERNATIONAL
BROTHERHOOD OF ELECTRICAL
WORKERS UNION, LOCAL 234
EDUCATIONAL AND TRAINING
FUND; INTERNATIONAL
BROTHERHOOD OF ELECTRICAL
WORKERS DISTRICT 9 PENSION
PLAN; and KENNETH
SCHERPINSKI, as Trustee of
Plaintiff Trusts and Business Manager
of Local 234,

CASE NO: 5:10-cv-05778-EJD

**STIPULATION AND [PROPOSED]
ORDER TO CONTINUE DISCOVERY
CUT-OFF AND RELATED DATES**

Assigned to:
Hon. Edward J. Davila, Courtroom 1
Magistrate Paul S. Grewal, Courtroom 5

Complaint Filed: December 20, 2010
Trial Date: Not Set

Plaintiffs,

v.
WILLIAM CHARLES PORGES, an
individual, dba ACCELERATED
ELECTRIC

Defendant.

/ / / / /

**STIPULATION AND [PROPOSED] ORDER TO CONTINUE DISCOVERY CUT-OFF
AND RELATED DATES**

1 Defendant William Charles Porges, dba Accelerated Electric and Plaintiffs
2 stipulate to continue the discovery deadline 30 days while settlement discussions
3 continue. The current discovery deadline is December 16, 2011. The new
4 discovery deadline will be January 15, 2012. This is the first extension of this
5 deadline. Other discovery-related dates in this case will likewise be extended 30
6 days.

7 IT IS SO STIPULATED.

8
9 DATED: December 13, 2011

MARKS, FINCH, THORNTON &
10 BAIRD, LLP

11 By: /s/ Chad T. Wishchuk
12 CHAD T. WISHCHUK
13 Attorneys for Defendant William Charles
Porges, dba Accelerated Electric

14
15 DATED: December 13, 2011

NEYHART, ANDERSON, FLYNN &
16 GROSBOLL

17 By: /s/ Chloe I. Quail
18 CHLOE I. QUAIL
19 Attorneys for Plaintiffs

Pursuant to the Stipulation stated above, the previously ordered Case Management Deadlines are modified as follows:

Fact Discovery Cutoff is extended to January 16, 2012;

Designation of Opening Experts with Reports is 28 days before modified Expert Discovery Cutoff;
Designation of Rebuttal Experts with Reports is 14 days before modified Expert Discovery Cutoff;
Expert Discovery Cutoff is extended to February 6, 2012;

Deadline for filing Dispositive Motions is extended to February 20, 2012.

All other deadlines not modified above remain as ordered.

IT IS SO ORDERED.

Dated: December 14, 2011



EDWARD J. DAVILA
United States District Judge